

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION**

In re:

Thad Walker Snow
and
Erin Leigh Snow

Debtor(s)

Chapter 13
Case No. 13-50815

MOTION FOR HARDSHIP DISCHARGE

NOW COME the Debtors, by and through counsel, and pursuant to 11 U.S.C. §1328(b) respectfully moves the Court for a Hardship Discharge. In support of the Motion, the undersigned shows the Court the following:

1. The Debtors filed a petition under Chapter 13 of the Bankruptcy Code on September 25, 2013.
2. The Chapter 13 Plan was confirmed by this Court on December 11, 2013.
3. There has been a substantial change in circumstances since the Debtors filed their petition in that:
 - a. The Debtors have suffered a substantial loss of income.
 - b. Shortly after filing, the male Debtor lost his job. An amended I & J was filed on January 16, 2014, showing the change in income.
4. The Debtors cannot make any further payments to support their Chapter 13 Plan.

FURTHER, the Debtors attest that the following is true and accurate to the best of their knowledge:

5. There is not pending a proceeding in which I may be found guilty of a felony of the kind described in Section 522(q)(1)(A) or liable for a debt of the kind described in Section 522(q)(1)(B).
6. The provisions of 11 U.S.C. §522(q)(1) are not applicable to me.
7. I am not required to pay any Domestic Support Obligations.

/s/Thad Walker Snow
Thad Walker Snow

/s/Erin Leigh Snow
Erin Leigh Snow

WHEREFORE, the Debtors respectfully pray for the following relief:

1. That this Court grant the Debtors a Hardship Discharge in this case pursuant to 11 U.S.C. §1328(b);
2. That the Debtors' attorney be granted the standard non-base fee of \$450.00 plus \$75.00 in expenses for the pursuit of this Motion, if those funds are available from the Trustee;
3. That the Trustee be allowed to modify the Plan in accordance with this Motion; and
4. For such other and further relief as this Court deems just and proper.

TODAY is August 15, 2014.

/s/ Danielle J. Brudi
Danielle J. Brudi, NC Bar# 44022
Collum & Perry, PLLC
109 West Statesville Avenue
Mooresville, NC 28115
T: (704) 663-4187 / F: (704) 663-4178

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION**

In re:

Thad Walker Snow
and
Erin Leigh Snow

Debtor(s)

Chapter 13
Case No. 13-50815

NOTICE OF MOTION AND HEARING

TAKE NOTICE that Danielle J. Brudi, Attorney for the Debtors in this case, has filed a **MOTION FOR HARDSHIP DISCHARGE** with the Court.

Your rights may be affected. You should read this notice carefully and discuss it with your Attorney, if you have one. If you do not have an Attorney that practices Bankruptcy law, it is strongly advised that you consult one.

A hearing will be held:

WHEN: September 5, 2014 at 9:30am

WHERE: US Courthouse
200 West Broad Street, Room 301
Statesville, NC 28677

If you do not attend this hearing, the Court may decide that you do not oppose the motion as set out above and may enter an order granting the relief requested.

TODAY is August 15, 2014.

/s/ Danielle J. Brudi
Danielle J. Brudi, NC Bar# 44022
Collum & Perry, PLLC
109 West Statesville Avenue
Mooresville, NC 28115
T: (704) 663-4187 / F: (704) 663-4178

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION**

In re:

Thad Walker Snow
and
Erin Leigh Snow

Debtor(s)

Chapter 13
Case No. 13-50815

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **MOTION FOR HARDSHIP DISCHARGE** was served upon the following by US Postal Service, e-mail or electronic service through the US Bankruptcy Court:

Thad & Erin Snow
7993 Summit Ridge Drive
Catawba, NC 28609

Steven G. Tate
Chapter 13 Trustee
212 Cooper Street
Statesville, NC 28677

US Bankruptcy Administrator
Western District of North Carolina
402 W. Trade St., Suite 200
Charlotte, NC 28202-1669

Creditor Matrix
(Attached)

TODAY is August 15, 2014.

/s/ Danielle J. Brudi
Danielle J. Brudi, NC Bar# 44022
Collum & Perry, PLLC
109 West Statesville Avenue
Mooresville, NC 28115
T: (704) 663-4187 / F: (704) 663-4178

Thad Walker Snow
7993 Summit Ridge Drive
Catawba, NC 28609

World Omni Financial Corp.
Attn: Corporate Officer
100 Jim Moran Blvd.
Deerfield Beach, FL 33442

Antio, LLC
c/o Weinstein, Pinson, and Riley, PS
2001 Western Avenue, Suite 400
Seattle, WA 98121

Bank of America
Attn: Corporate Officer
PO Box 15026
Wilmington, DE 19850

Capital One Bank / Best Buy
Attn: Corp Officer
PO Box 30285
Salt Lake City, UT 84130

Carmax Auto Finance
Attn: Corporate Officer
P.O. Box 440609
Kennesaw, GA 30160-9511

Catawba County Tax Collector
P.O. Box 368
Newton, NC 28658-0368

Chase Auto Finance Corporation
Attn: Corporate Officer
Azt-1191
201 N. Central Avenue
Phoenix, AZ 85006

Chase Card Services
Attn: Corporate Officer
P.O. Box 15298
Wilmington, DE 19850-5298

Chase Home Mortgage Customer Service
Attn: Corporate Officer
PO Box 24696
Columbus, OH 43218-0696

Chex Systems, Inc.
Attn: Consumer Relations
7805 Hudson Road
Suite 100
Saint Paul, MN 55125

Citibank
Attn: Corporate Officer
PO Box 6500
Sioux Falls, SD 57117

Citibank South Dakota
Attn: Corporate Officer
PO Box 6241
Sioux Falls, SD 57117

Citibank, NA
Attn: Centralized Bankruptcy
PO Box 20507
Kansas City, MO 64195

CitiFinancial, Inc.
Bankruptcy Department
Attn: Corp Officer
NTSB-2320 6801 Colwell Blvd
Irving, TX 75039

Client Services, Inc
Attn: Corporate Officer
3451 Harry Truman Blvd
Saint Charles, MO 63301

Credit Bureau of Greensboro Inc.
Attn: Corp Officer
225 Commerce Place
Greensboro, NC 27401

DB Servicing Corporation
Attn: Corporate Officer
P.O. Box 3025
New Albany, OH 43054-3025

Discover
Attn: Corp Officer
PO Box 30421
Salt Lake City, UT 84130-0421

First Citizens Bank & Trust
Attn: Corporate Officer
P.O. Box 25187
Raleigh, NC 27611

GECRB
Attn: Corporate Officer
Bankruptcy Department
PO Box 103104
Roswell, GA 30076

Grady I. Ingles or Elizabeth B. Ellis
C/o Shapiro & Ingle
10130 Perimeter Parkway
Suite 400
Charlotte, NC 28216

Holly Zurawski
Attorney for the Substitute Trustee
10130 Perimeter Parkway
Suite 400
Charlotte, NC 28216

Honda Financial Services
Attn: Corp Officer
PO Box 49070
Charlotte, NC 28277

IRS
PO Box 7346
Philadelphia, PA 19101-7346

JP Morgan Chase Bank, N.A.
Attn: Corp Officer
3415 Vision Drive
Columbus, OH 43219-6009

National Bankruptcy Center
PO Box 168088
Irving, TX 75016-8088

NC Department of Revenue
PO Box 25000
Raleigh, NC 27640

North Carolina Child Support Enforcement
Attn: Corporate Officer
PO Box 20800
Raleigh, NC 27619-0800

Northland Group, Inc.
Attn: Corp Officer
7831 Glenroy Road, Suite 250
Edina, MN 55439

People's Bank of North Carolina
Attn: Corp Officer
PO Box 467
Newton, NC 28658-0467

Peoples Bank
Attn: Corporate Officer
518 West C Street
Newton, NC 28658

PNC Mortgage
Attn: Corp Officer
B6-YN07-01-9
PO Box 3110
Dayton, OH 45401-3110

Portfolio Recovery Associates LLC
Attn: Corporate Officer
P.O. Box 41067
Norfolk, VA 23541

Quantum3 Group LLC
MOMA Funding LLC
PO Box 788
Kirkland, WA 98083-0788

Sallie Mae, Inc.
Attn: Corporate Officer
PO Box 9500
Wilkes Barre, PA 18773-9500

Shapiro and Ingle, LLP
10130 Perimeter Parkway, Suite 400
Charlotte, NC 28216-2461

United Consumer Financial Services
Attn. Corporate Officer
865 Bassett Rd
Westlake, OH 44145

US Bank, NA
Attn. Corporate Officer
PO Box 6335
Fargo, ND 58125-6335

Wells Fargo
Attn: Corporate Officer
420 Montgomery Street
San Francisco, CA 94104

Wells Fargo Home Mortgage-
Attn: Corp Officer
P.O. Box 10335
Des Moines, IA 50306

World Omni Financial Corp,
c/o Weltman, Weinberg & Reis
323 W. Lakeside Avenue, Suite 200
Cleveland, OH 44113

World Omni Financial Corp.
Attn. Corporate Officer
PO Box 91614
Mobile, AL 36691